

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

RICHARD XIA, a/k/a YI XIA, et al.,

Defendants,

and

JULIA YUE, a/k/a JIQUING YUE, et al.,

Relief Defendants.

Case No. 21-cv-05350-PKC-RER

**DECLARATION OF MICHAEL J. RINALDI**

I, Michael J. Rinaldi, hereby declare and state, to the best of my knowledge, information, or belief, as follows:

1. I am over eighteen years of age and competent to make this declaration.
2. I am a member of the bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the District of Columbia. I have been admitted pro hac vice in the above-captioned action. I am a partner at the law firm of Duane Morris LLP, attorneys for relief defendants Xi Verfenstein and Xinming Yu. I make this declaration in support of Ms. Verfenstein and Ms. Yu's motion for leave to file a sur-reply and their proposed sur-reply in opposition to the SEC's motion to extend the asset freeze (ECF 99).
3. Attached to this declaration as Exhibit A is a true and correct copy of a document marked as SEC v Xia Exhibit 4.

4. Attached to this declaration as Exhibit B is a true and correct copy of excerpts of Ms. Verfenstein's February 8, 2022, deposition transcript.

5. Attached to this declaration as Exhibit C are true and correct copies of documents entitled "Application and Certificate for Payment."

6. Attached to this declaration as Exhibit D is a true and correct copy of a document entitled "Plaintiff's First Set of Interrogatories to Defendant Richard Xia."

7. Attached to this declaration as Exhibit E is a true and correct copy of a document entitled "Plaintiff's Second Request to Defendants for the Production of Documents."

I declare under penalty of perjury that the forgoing is true and correct. Executed on May 20, 2022.

s/ Michael J. Rinaldi

Michael J. Rinaldi